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8 *Attorneys for Plaintiff*
 9 *The United States of America*

10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 STEPHEN T. PARSHALL,
 aka "Kiwi"
 ANDREW LYNAM, and
 WILLIAM L. LOOMIS,

16 Defendants.

CRIMINAL INDICTMENT

17 Case No.: 2:20-cr- 128

VIOLATIONS:

18 U.S.C. §§ 844 (f), (i), and (n) –
 Conspiracy to damage and destroy by fire
 and explosive; and

19 26 U.S.C. §§ 5841, 5861(d), and 5871 –
 Possession of unregistered firearms.

20 THE GRAND JURY CHARGES THAT:

21 **COUNT ONE**

22 Conspiracy

23 1. Beginning from at least in or about April 2020 and continuing up to and including
 on or about May 30, 2020, in the State and Federal District of Nevada, and elsewhere,

24 **STEPHEN T. PARSHALL,**
 aka "Kiwi"
ANDREW LYNAM, and
WILLIAM L. LOOMIS,

defendants herein, and others known and unknown, knowingly combined, conspired, confederated, and agreed to commit the following offenses against the United States, in violation of Title 18, United States Code, Section 844(n), that is:

a. to maliciously damage and destroy, by means of fire and explosives, buildings and other personal or real property, in whole and in part owned possessed by or leased to the United States, a department and agency of the United States by means of fire and explosive, in violation of Title 18, United States Code, Section 844(f); and

b. to maliciously damage and destroy, by means of fire and explosives, buildings and other personal and real property, used in interstate commerce and in any activity affecting interstate commerce, in violation of Title 18, United States Code, Section 844(i);

All in violation of Title 18 United States Code, Sections 844(f), (i), and (n).

COUNT TWO
Possession of an Unregistered Firearm

2. On or about May 30, 2020, in the State and Federal District of Nevada,

**STEPHEN T. PARSHALL,
aka "Kiwi"
ANDREW LYNAM, and
WILLIAM L. LOOMIS.**

defendants herein, possessed firearms, specifically destructive devices, as that term is defined in Title 18 United States Code, Section 5845(f), that were not registered to them in

1 the National Firearms Registration and Transfer Record, all in violation of Title 26 United
2 States Code, Sections 5841, 5861(d), and 5871.

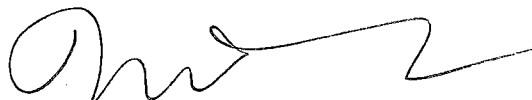
3 **DATED:** this 17th day of June, 2020.
4

5 **A TRUE BILL:**

6

7 /S/
8 FOREPERSON OF THE GRAND JURY

9 NICHOLAS A. TRUTANICH
10 United States Attorney

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12 NICHOLAS D. DICKINSON
13 Assistant United States Attorney

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